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June 5, 2002

VIA HAND DELIVERY

Mr. K. David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: In the Matter of Petition of Tennessee UNE-P Coalition to Open Contested Case
Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network
Element
Docket No. 02-00207

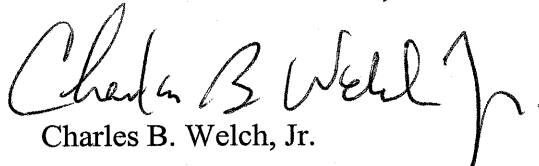
Dear Mr. Waddell:

Enclosed for filing, please find the original plus thirteen (13) copies of the Objections of Time Warner Telecom of the Mid-South, L.P. to First Data Requests of the UNE-P Coalition in the referenced docket. Copies have been served upon all parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,
BOBANGO & HELLEN, P.L.C.**


Charles B. Welch, Jr.

CBW:lw
Enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

Re: *Petition of UNE-P Coalition to Open*)
Contested Case Proceeding to Declare)
Unbundled Switching an Unrestricted)
Unbundled Network Element)

Docket No. 02-00207

**OBJECTIONS OF TIME WARNER TELECOM OF THE MID-SOUTH, L.P.
TO FIRST DATA REQUESTS OF THE UNE-P COALITION**

Comes now Time Warner Telecom of the Mid-South, L.P. ("Time Warner") and respectfully objects to the following written interrogatories propounded upon it by the UNE-P Coalition:

1. Please state (a) the number of operational local circuit switches (SEs or the equivalent) that Time Warner has deployed in Tennessee; (b) where those switches are located; (c) how long they have been in operation; and (d) how many customers are served by each of them.

1(d): Objection. This Request requires disclosure of confidential, proprietary and extremely commercially sensitive information which is not reasonably calculated to lead to discovery of admissible evidence.

3. Please state, for each of the collocation facilities identified above, the number of Time Warner business customers to whom Time Warner provisions service using (a) unbundled analog loops; (b) unbundled DS-1 loops; (c) unbundled DS-3 loops; (d) DS-1 special access; (e) DS-3 special access; and (f) non-BellSouth provided fiber or other loop facilities.

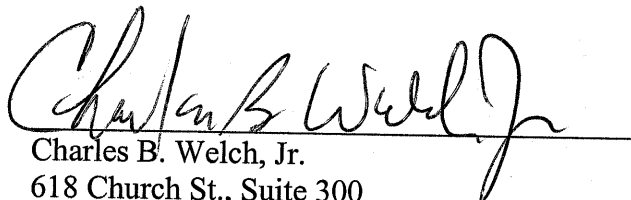
3. Objection. This Request is overly broad and unduly burdensome, requests confidential and proprietary information, and is not reasonably calculated to lead to discovery of admissible evidence.

4. Please provide the traffic exchanged between BellSouth and Time Warner in 2001, split between MOUs originating with Time Warner subscribers and terminating with BellSouth, and MOUs originating with BellSouth subscribers and terminating with Time Warner.

4. **Objection. This Request is overly broad and unduly burdensome, and is not reasonably calculated to lead to discovery of admissible evidence.**
5. Please provide (a) the total number of lines connected to Time Warner's switch(es) in Tennessee; and (b) the number of those lines used to serve providers of Internet access service.
5. **Objection. This Request is overly broad and unduly burdensome, and is not reasonably calculated to lead to discovery of admissible evidence.**
6. Please provide all documents relating to any profitability analysis conducted by Time Warner concerning service provided to business customers with 24 or fewer lines.
6. **Objection. This Request is overly broad and unduly burdensome, and is not reasonably calculated to lead to discovery of admissible evidence. Further, this information, if it exists, is of a confidential, proprietary and commercially sensitive nature, which would be extremely expensive to assimilate, is inadmissible and could not possibly lead to discovery of admissible evidence.**
7. Please provide copies of all documents prepared by Time Warner related to hot cuts and loop provisioning, including without limitation time-and-motion studies and similar analyses.
7. **Objection. This Request is overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.**

Respectfully submitted,

FARRIS MATHEWS BRANAN
BOBANGO & HELLEN, PLC



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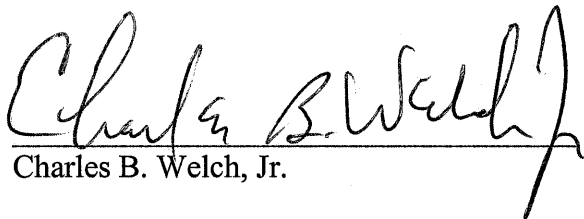
Attorney for Time Warner Telecom of the Mid-South, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, postage prepaid, and via facsimile to the following on this the 5th day of June, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, Tennessee 37219


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